

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

CIVIL CASE NO. 3:14-CV-91

KENNETH D. BELL, in his capacity as court-appointed Receiver for Rex Venture Group, LLC d/b/a ZeekRewards.com,

Plaintiff,

vs.

TODD DISNER, in his individual capacity and in his capacity as trustee for Kestrel Spendthrift Trust; TRUDY GILMOND; TRUDY GILMOND, LLC; JERRY NAPIER; DARREN MILLER; RHONDA GATES; DAVID SORRELLS; INNOVATION MARKETING, LLC; AARON ANDREWS; SHARA ANDREWS; GLOBAL INTERNET FORMULA, INC.; T. LEMONT SILVER; KAREN SILVER; MICHAEL VAN LEEUWEN; DURANT BROCKETT; DAVID KETTNER; MARY KETTNER; P.A.W.S. CAPITAL MANAGEMENT LLC; LORI JEAN WEBER; and a Defendant Class of Net Winners in ZEEKREWARDS.COM;

Defendants.

**MOTION TO SET ASIDE
JUDGMENT PURSUANT TO
RULE 60(b)(6)**

Movant, Lulu Yang, pursuant to Federal Rule of Civil Procedure 60(b)(6), moves this Court for entry of an order setting aside the Final Judgment entered against her on August 14, 2017. This Motion is supported by Movant's Memorandum ("Memorandum in Support of Movant's Motion to Set Aside Judgment"), submitted herewith. This Motion is further supported by the Declaration of Lulu Yang in

Support of Movant's Motion to Set Aside Judgment, and Exhibits attached thereto,
attached as Exhibit A to the Memorandum.

WHEREFORE, Movant prays the Court to grant her Motion to Set Aside
Judgment.

Respectfully submitted this 31st day of December, 2021.

/s/ William R. Terpening
William R. Terpening
N.C. Bar 36418
Tomi M. Suzuki
N.C. Bar 55561

TERPENING LAW PLLC
221 W. 11th St.
Charlotte, North Carolina 28202
terpening@terpeninglaw.com
suzuki@terpeninglaw.com
(980) 265-1700

Counsel for Lulu Yang

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the **MOTION TO SET ASIDE JUDGMENT PURSUANT TO RULE 60(b)(6)** was submitted via the CM/ECF system, which constitutes service on all parties.

This the 31st day of December, 2021.

/s/ William R. Terpening
William R. Terpening